

CORRES. CONTROL
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00600RFO1

DUE DATE
ACTION

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Department of Energy

2001 SEP -5 P 1:59

ROCKY FLATS FIELD OFFICE
10808 HIGHWAY 93, UNIT A
GOLDEN, COLORADO 80403-8200CORRESPONDENCE
CONTROL

SEP 04 2001

01-DOE-01660

DIST.	LTR	ENC
BOGENBERGER, V.		
BOGNAR, E.		
BRAILSFORD, M.D.		
BURNS, T.F.		
DECK, C.A.	X	X
DIETERLE, S.E.		
FERRERA, D.W.		
FERRI, M.S.		
FULTON, J.C.		
GERMAIN, A.L.		
GIACOMINI, J.		
HALL, L.		
ISOM, J.H.		
MARTINEZ, L.A.	X	X
PARKER, A.M.	X	X
POWERS, K.		
RAAZ, R.D.		
RODGERS, A.D.		
SANDLIN, N.B.		
SCOTT, G.K.	X	X
SHELTON, D.C.	X	X
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N.R.		
VOORHEIS, G.M.		
WILLIAMS, J.L.		
BUTLER, I.	X	X
BROOKS, I.	X	X
RELLERGER, C.	X	X

Ms. Shirley Garcia
City of Broomfield
Environmental Services Coordinator
One DesCombes Drive
Broomfield, Colorado 80020

Dear Ms. Garcia:

On July 6, 2001, the Rocky Flats Environmental Technology Site (Site) staff received an e-mail from you regarding key issues that you have with the Environmental Restoration Rocky Flats Cleanup Agreement Standard Operating Protocol (ER RSOP). Enclosed please find the Site's responses to your issues. Your issues have been addressed in the revised ER RSOP before it is sent out for formal public comment.

We appreciate the issues that you have raised in the ER RSOP, and look forward to providing regular updates on the status of the remediation projects during the public meeting process.

Sincerely,

Joseph A. Legare
Joseph A. Legare
Assistant Manager
for Environment and Stewardship

CORR. CONTROL	X	X
ADMIN. RECORD	X	X
PATS/130		

Enclosure

Reviewed for Addressee
Corres. Control RFPDate 9/5/01 By by

Ref. Ltr. #

DOE ORDER #

NONE

cc w/Enc:
N. Castaneda, ER, RFFO
L. Butler, K-H
K. Schnoor, City of Broomfield
M. Harlow, City of Westminster
N. Stenger, RFCAB
S. Tarlton, CDPHE
C. Spreng, CDPHE
G. Kleeman, EPA
Administrative Record

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD

SW-A-004373

1/5

Response to Comments – Working Draft RSOP for Soil Remediation

	Comments City of Broomfield, July 6, 2001	Response
1	Stewardship - Excavation is a remedy and I would like to see stewardship addressed along with the remedy selection criteria.	<p>A section is being added to the ER RSOP that discusses how the accelerated actions contribute to Site environmental stewardship goals and how stewardship will be evaluated for accelerated actions. DOE is developing a Stewardship Plan in consultation with the Stewardship Working Group.</p> <p>Because remedial options for radionuclide contaminated soil (with or without other contamination) are limited, the most conservative option, excavation and offsite disposal, is the primary remediation in the ER RSOP. If a different remediation is required, it will be described in an ER RSOP modification or PAM. In accordance with the IGD, RSOPs and PAMs do not require a CERCLA alternative analysis. A CERCLA remedy alternatives analysis will be included in the Corrective Measure Study/Feasibility Study (CMS/FS).</p>
2	ALARA - I understand the ALARA process has been finalized and it should be incorporated into the final decision process for remedial decisions.	Radiation Control ARARs and an ALARA evaluation have been added to the ER RSOP.
3	Public Involvement - There is little mention of public involvement in the document. When revisions are made, the public should be involved in the process.	The Public Participation section has been expanded and moved to a new Section 2.3.

Response to Comments – Working Draft RSOP for Soil Remediation

4	Process Lines/Sanitary Sewer/Storm Drains - More information is needed pertaining to underground systems. Discussion needs to take place addressing the 10 foot depth limit.	Text has been added to old Section 5.6.4 (new Section 6.5.4) indicating that if actions other than excavation are required, an ER RSOP Modification or PAM will be written.
5	Project Approach - I feel this is the most important section of the document and it does not detail the specifics of the process such as work process, work planning, remedial decisions, and documentation of the entire process.	<p>The work process is described in Section 5.0 (now Section 6.0) and is supplemented by Section 8.0 (now Section 9.0) Work Controls. Remedial decisions are discussed throughout the document in Sections 4.0, 5.0, 6.0, and 8.0 (new Sections 5.0, 6.0, 7.0, and 9.0)</p> <p>Work activities will be planned, executed, and controlled in accordance with the <i>Field Implementation Plan</i>, which is incorporated into the RSOP through reference.</p>
6	Monitoring - Specifics are not addressed.	Specific monitoring requirements during remediation projects will be determined, through the consultative process, before remediation starts. As stated in Section 6.0 (now 7.0), monitoring requirements will depend on the existing compliance monitoring network as well as additional monitoring locations set up for decommissioning activities. Additional monitoring locations will be described in the Integrated Monitoring Plan.

7	<p>Non-routine Activities - Several of the activities identified within the ER RSOP are not routine, therefore should be omitted.</p>	<p>Routine, as used in the ER RSOP, is generally consistent with other industry definitions of the term, i.e., activities of a repetitive nature guided by procedures. Three key considerations support the ER RSOP concept of routine versus non-routine:</p> <ol style="list-style-type: none"> 1. Except for groundwater plumes, ER cleanup actions all involve soil and associated debris. Furthermore, the spectrum of PCOCs is fairly narrow and remediation options are limited. 2. While both the levels of contamination and the configuration of contaminant release sites vary, the remedial options remain limited. The variation in configuration and levels of contamination change the level of complexity of the cleanup action but not the essential repetitiveness of the remedial action itself. The variations in complexity are addressed through application of the appropriate work controls. 3. Non-routine is an attribute ascribed to those remedial actions that require special engineering design and/or regulatory agency approval. These actions are not covered under the ER RSOP and include closure of the two landfills, the Solar Evaporation Ponds, the Industrial Area groundwater plume, the 903 Lip Area, and perhaps, a portion of the OPWL. <p>It is anticipated that contaminated soil and debris in all IHSSs, PACs, and UBC sites, except those excluded above, will be remediated under the ER RSOP. This would include OPWL, NPWL, sanitary sewers, and storm drains) as well as several other below-ground structures (slabs, foundation drains, and tanks) that will not be dealt with during decommissioning.</p>
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Response to Comments – Working Draft RSOP for Soil Remediation

8	QA/QC - The process lacks depth and there is no discussion of Independent Validation of work activities.	The QA/QC requirements for verification of characterization and confirmation sampling data are contained in the Industrial Area Sampling and Analysis Plan and Draft Buffer Zone Sampling and Analysis Plan. These plans include automated data verification and validation of field and analytical data as well as independent data validation according to current Site procedures.
9	NEPA – The environmental consequences discussed in the document do not meet the criteria of impacts associated with remediation of soil and underground debris	The Environmental Consequences section describes the impact of excavating soil, transporting soil offsite, and backfilling soil on soil, geology, air quality, water quantity and quality, human health, safety, ecological resources, cultural resources, visual changes, noise, transportation, and socioeconomics in accordance with applicable NEPA requirements. The Environmental Consequences section also includes discussion of cumulative effects, unavoidable adverse effects, short-term uses versus long-term productivity, and irreversible and irretrievable commitments.